## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No. 21-cv-23103-BB

CASA EXPRESS CORP, as Trustee of CASA EXPRESS TRUST,

Judgment Creditor,

VS.

BOLIVARIAN REPUBLIC OF VENEZUELA,

| Judgment Debtor. |  |
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UNOPPOSED MOTION TO CONTINUE SEPTEMBER 25, 2023 HEARING

Without objection, Respondents, Raul Gorrin Belisario, Planet 2 Reaching, Inc., Posh 8 Dynamic, Inc., RIM Group Investments Corp., RIM Group Investments I Corp., RIM Group Investments III Corp., and RIM Group Investments III Corp., through undersigned counsel, move the Court for a continuance of the hearing currently scheduled for Monday, September 25, 2023 at 1:30 p.m., which falls on the Jewish holiday of Yom Kippur.

- 1. On August 31, 2023, Plaintiff filed a Motion to determine whether Gorrin must testify in person at the jury trial in this matter. ECF No. 220.
- 2. On September 1, 2023, Magistrate Judge Otazo-Reyes issued a Paperless Order setting a hearing on Plaintiff's Motion for September 25, 2023 at 1:30 p.m. ECF No. 221. September 25, 2023 is the Jewish holiday of Yom Kippur.
- 3. On September 6, 2023, Plaintiff filed its First Motion to Extend Notices of Lis Pendens. ECF No. 222.

- 4. On September 11, 2023, Magistrate Judge Otazo-Reyes issued a Paperless Supplemental Order advising the Parties that Plaintiff's First Motion to Extend Notices of Lis Pendens would also be heard on September 25, 2023 at 1:30 p.m. ECF No. 223.
- 5. Undersigned counsel for Respondents, who is Jewish, intends to participate in the hearing scheduled for September 25, 2023, and therefore respectfully requests that the hearing be rescheduled to a later date.
- 6. Good cause exists to continue the September 25, 2023 hearing and no party will be prejudiced by the requested continuance.

## **CERTIFICATION REGARDING PRE-FILING CONFERENCE**

Pursuant to Local Rule 7.1(a)(3), undersigned counsel certifies that Plaintiff does not oppose the relief requested in the Motion.

Respectfully submitted,

## **BLACK SREBNICK, P.A.**

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